

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: PROTON-PUMP INHIBITOR  
PRODUCTS LIABILITY LITIGATION**

**MDL No. 2789**

**This Document Relates To:**

***Freddy Bales v. AstraZeneca Pharmaceuticals LP***  
**Case No. 2:17-cv-06124**

**NOTICE OF MOTION TO EXCLUDE EXPERT TESTIMONY OF  
GILBERT MOECKEL, M.D., PH.D.**

**PLEASE TAKE NOTICE** that on November 15, 2021, or as soon thereafter as counsel may be heard, the undersigned counsel for Defendants Takeda Pharmaceuticals U.S.A., Inc., Takeda Pharmaceuticals America, Inc., Takeda Development Center Americas, Inc. f/k/a/ Takeda Global Research & Development Center, Inc., and Takeda Pharmaceutical Company Limited (collectively, “Takeda Defendants”) will move before United States District Court for the District of New Jersey, Martin Luther King Building & Courthouse, 50 Walnut Street, Newark, NJ 01702, pursuant to Federal Rule of Civil Procedure 56, for an Order granting Defendants’ Motion to Exclude Testimony of Gilbert Moeckel, M.D., Ph.D., on the grounds that it is inadmissible under Federal Rule of Evidence 702.

**PLEASE TAKE FURTHER NOTICE** that in support of this Motion, the Takeda Defendants rely on the Memorandum in Support of the Motion, the Certification of Vincent Lodato, and the evidence attached thereto. Pursuant to Local Federal Civil Rule 7.1(e), a proposed form of Order is submitted herewith.

Date: October 15, 2021

Respectfully submitted,

**SILLS CUMMIS & GROSS P.C.**

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 15, 2021 a true and correct copy of the *Defendants' Motion to Exclude Expert Testimony of Gilbert Moeckel, M.D., Ph.D.* was filed with the Court via ECF and is deemed served on all counsel of record.

/s/ Vincent Lodato  
VINCENT LODATO